

March 8, 2006

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CPNI Compliance Certification of Pacific Data Systems
WC Docket No. 05-196

Dear Sir or Madam:

Submitted herewith please find the CPNI Compliance Certificate of Pacific Data Systems in the above-referenced document, filed pursuant to the Commission's Public Notice, DA 06-223, released January 30, 2006. The address of Pacific Data Systems is 185 Ilipog Drive, Suite 204-A, Tamuning, Guam 96913.

Pacific Data Systems respectfully asks leave to file this Certificate after the February 6 deadline set by the Commission in its Public Notice. Pacific Data Systems holds both Section 214 international operating authority and a certificate to provide competitive local exchange services in Guam. To date, however, the company has no retail customers. Consequently, the management of the company tentatively concluded that a response to the Public Notice might not be necessary. Upon consultation with the undersigned counsel, and out of an abundance of caution, the company has reconsidered this initial determination, and submits its certificate herewith.

Should any questions arise concerning the attached filing, please contact the undersigned counsel.

Sincerely,



Eric Fishman
Counsel to Pacific Data Systems

Attachment

cc: Byron McCoy
Telecommunications Consumers Division
Enforcement Division

Federal Communications Commission

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Federal Communications Commission

Room 4-A234

445 12th Street, SW

Washington, DC 20554

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Pacific Data Systems

185 Ilipog Drive, Suite 204-A

Tamuning, Guam 96913

Contact Person: Robert J. Maloney, Chairman and CEO

Pacific Data Systems ("PDS"), a telecommunications carrier, has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- PDS has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- PDS continually educates and trains its employees regarding the appropriate use of CPNI. PDS has established disciplinary procedures should an employee violate the CPNI procedures established by PDS.
- PDS maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. PDS also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- PDS has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, PDS's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.
- In accordance with Section 64.2009(e) of the Commission's rules, an officer of PDS has executed a compliance certificate stating that the officer has personal knowledge that PDS has established operating procedures that ensure compliance with the Commission's CPNI rules.

Certification of CPNI

I, Robert J. Maloney, hereby state and declare:

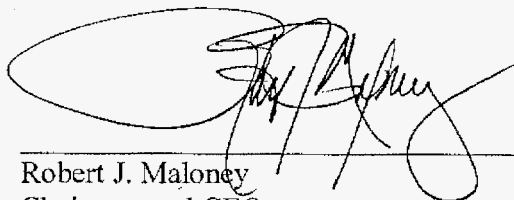
1. I am the Chairman and CEO of Pacific Data Systems, which holds Section 214 international operating authority and is certificated as a competitive local exchange carrier in the Territory of Guam, and plans to initiate the latter service later this year.

2. As an officer of PDS, I certify that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's Customer Proprietary Network Information ("CPNI") rules at Part 64.2001, *et seq.*

3. I am familiar with the facts contained in the foregoing Statement of CPNI Procedures and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of February, 2006.



Robert J. Maloney
Chairman and CEO
Pacific Data Systems